

# **EXHIBIT E**

**Newman, Hayley B.**

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**From:** Newman, Hayley B.  
**Sent:** Tuesday, September 21, 2021 2:00 PM  
**To:** 'JAE LEE'  
**Subject:** RE: FW: Activity in Case 1:20-cv-02636-PKC-LB Park v. Kim Scheduling Order  
**Attachments:** HPMB\_NY1-#2458859-v1-Park\_-\_Joint\_Ltr\_in\_Response\_to\_Court\_s\_Order.DOCX

Ms. Lee,

Please add your position about your client's deposition under the sub-heading Plaintiff's position and return this to me before 9/24 so that I can timely file this with the Court.

Thank you,

Hayley Newman  
Partner  
Heidell, Pittoni, Murphy & Bach  
99 Park Avenue  
New York, NY 10016  
Tel: (212) 286 - 8585  
Fax: (212) 490 - 8966  
[www.hpmb.com](http://www.hpmb.com)



**From:** JAE LEE <jae@lawjsl.com>  
**Sent:** Tuesday, September 21, 2021 1:26 PM  
**To:** Newman, Hayley B. <hnewman@hpmb.com>  
**Cc:** Chauhan, Rimsha <rchauhan@hpmb.com>  
**Subject:** Re: FW: Activity in Case 1:20-cv-02636-PKC-LB Park v. Kim Scheduling Order

Ms. NEWMAN,

To be clear, the time of the Deposition MUST BE IN S. KOREA TIME, which the plaintiff is answering. The New York Time is 10:30PM to 4:00 AM. Once you confirm the time, we will set up the date.

Deposition scheduled on September 20, 2021, was rejected due to the time dispute and you have never informed how to access the remote Deposition instruction.

On Tue, Sep 21, 2021, 12:41 PM Newman, Hayley B. <[hnewman@hpmb.com](mailto:hnewman@hpmb.com)> wrote:

Dear Ms. Lee,

I am reaching out to you in accordance with the Order issued below by the Court. We are available to conduct your client's deposition between 9:30 a.m. and 5:00 p.m. on the following dates: September 29, October 5, October 6, October 8 and October 25. Please advise whether these work for plaintiff.

Please be further advised that our office appeared with a court reporter and Korean interpreter for your client's deposition in accordance with the Second Notice. Attached is a transcript of the records and exhibits that were marked.

If you are unwilling to reschedule your client's deposition during the hours noted above, I will send you a draft letter and you can include your position under the "Plaintiff's position" section and we will file it with the Court before the deadline of 9/24.

Thank you for your attention to the above.

Hayley Newman

Partner

Heidell, Pittoni, Murphy & Bach

99 Park Avenue

New York, NY 10016

Tel: (212) 286 - 8585

Fax: (212) 490 - 8966

[www.hpmb.com](http://www.hpmb.com)



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**From:** [ecf\\_bounces@nyed.uscourts.gov](mailto:ecf_bounces@nyed.uscourts.gov) <[ecf\\_bounces@nyed.uscourts.gov](mailto:ecf_bounces@nyed.uscourts.gov)>

**Sent:** Monday, September 20, 2021 10:19 AM

To: [nobody@nyed.uscourts.gov](mailto:nobody@nyed.uscourts.gov)

Subject: Activity in Case 1:20-cv-02636-PKC-LB Park v. Kim Scheduling Order

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U.S. District Court

Eastern District of New York

## Notice of Electronic Filing

The following transaction was entered on 9/20/2021 at 10:19 AM EDT and filed on 9/20/2021

Case Name: Park v. Kim

Case Number: [1:20-cv-02636-PKC-LB](#)

Filer:

Document Number: No document attached

### Docket Text:

**ORDER:** Plaintiff requests a protective order addressing the time of her scheduled deposition. ECF No. [24]. Her request states that her deposition is scheduled for today, Monday, September 20, 2021, however, she filed her request on the evening of Saturday, September 18, 2021 when the Court was unavailable. Id.

**The parties shall file a joint status letter by September 24, 2021 stating whether they proceeded with plaintiff's deposition. If the deposition did not proceed, the parties' letter shall state an agreed upon date and time for plaintiff's rescheduled deposition. Ordered by Magistrate Judge Lois Bloom on 9/20/2021. (Rein, Gilbert)**

**1:20-cv-02636-PKC-LB Notice has been electronically mailed to:**

Robert B. Gibson [rgibson@hpmb.com](mailto:rgibson@hpmb.com)

Jae Soog Lee [jae@lawjsl.com](mailto:jae@lawjsl.com)

Olivia Darius [odarius@hpmb.com](mailto:odarius@hpmb.com)

Hayley B Newman [hnewman@hpmb.com](mailto:hnewman@hpmb.com)

1:20-cv-02636-PKC-LB Notice will not be electronically mailed to:

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----- Forwarded message -----

From: GinaMarie DeMarco <[gmdreporting@gmail.com](mailto:gmdreporting@gmail.com)>  
To: "Newman, Hayley B." <[hnewman@hpmb.com](mailto:hnewman@hpmb.com)>  
Cc:  
Bcc:  
Date: Mon, 20 Sep 2021 13:26:26 +0000  
Subject: Re: Park - Emails

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On Mon, Sep 20, 2021 at 9:22 AM Newman, Hayley B. <[hnewman@hpmb.com](mailto:hnewman@hpmb.com)> wrote:

Exhibit

Hayley Newman

Partner

Heidell, Pittoni, Murphy & Bach

99 Park Avenue

New York, NY 10016

Tel: (212) 286 - 8585

Fax: (212) 490 - 8966

[www.hpmb.com](http://www.hpmb.com)



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*GinaMarie DeMarco*  
*Court Reporter*